

REMARKS/ARGUMENTS

Claims 33-38 are currently pending in the present application. Claims 1-32 have been withdrawn from consideration. By this amendment, Applicants have canceled claims 1-32. In the instant Office Action, the Examiner has rejected claims 33-38 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,938,031 to Zoltan et al.

Applicants respectfully traverse the rejection, and respectfully request reconsideration of the present application. Applicants had previously amended claims 33 and 36 to state that the mapping module is operative to "stream" record chunks to the second client node as they are received from the first client node." As such, the claimed subject matter is directed to a messaging system that streams record chunks associated with a given record (which includes a unique identifier) to one or more subscribing nodes. By this amendment, Applicants have also amended the claims to state that the record chunks correspond to a data stream. Applicants have also added claims 39 and 40 to state that the nodes transmit notifications to reserve unique identifiers.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." See MPEP § 2131 (quoting *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

Zoltan fails to disclose the claimed subject matter. Turning specifically to the Examiner's allegations, the Examiner alleges that Zoltan's data table is equivalent to a content map, and that Zoltan's change table is equivalent to an index map. This is incorrect. In Zoltan, the data table stores information in rows and columns, where each row includes a unique row identifier. A change table, in Zoltan, is simply those rows of

the data table that have been changed. The entries in the change table may include a time stamp to resolve conflicts during synchronization. See Zoltan, Col. 15, lines 1-10. In contrast, an index map of the claimed subject matter stores record attribute values in association with a unique identifier, while a content map stores record chunks of a data stream in association with the unique identifier. Accordingly, the rows of the content map and the index map store different information—that is, the index map stores record attributes, while the content map stores record chunks of a data stream. In contrast, the entries of the change table of Zoltan, in most instances, store copies of entries of the data table (with the addition of a time stamp). See Zoltan, Col. 18, lines 31 et seq.

The Examiner also alleges that Zoltan's row identifier is equivalent to the "unique identifier" of the claimed subject matter, and that Zoltan's row identifier is provided to a client node. This is demonstrably incorrect.¹ Indeed, Zoltan discloses that row identifiers are abstracted away from client applications and specifically *not* provided to client nodes. Zoltan actually goes to great lengths to employ a logical data structure 424a to hide the details of the row identifiers to client applications, since the client applications may have difficulty handling them (See Zoltan, Col. 15, lines 31-44; and generally Cols. 15 to 16 (discussion of operation of logical structure 424a)).

The Examiner also incorrectly relies on the same passages in Zoltan to allege that it teaches both receiving record insertion messages, and record chunks. See Office Action at 3 (last 3 lines). As explained above, a record insertion message results in the creation of an entry in an index map including record attribute values, while record chunks of a data stream are stored in a content map. Since record chunks are different from record

¹ Furthermore, the Office Action does not clearly indicate which element of Zoltan the Examiner considers to be a client node. For purposes of this response, Applicants assume that a client node could be a web server 110 or a client 102 as shown in Figure 1 of Zoltan.

attribute values, this aspect of Zoltan fails to teach the claimed subject matter.

Still further, the Examiner alleges that Zoltan teaches a system that streams additional record chunks to a second client node. Again, this is demonstrably incorrect even from the face of the Examiner's allegations in the office action. As discussed above, a client node may be a web server or a client system (in Zoltan). The Examiner appears to allege that processing of the change table by the replication agent teaches this streaming step. However, the changes are provided to another database 412 (which would be equivalent, for purposes of argument, to the data repository nodes). Accordingly, there is no teaching in Zoltan of streaming additional record chunks to clients. In addition, the entries of the change table are not record chunks of a data stream as discussed above.

In light of the foregoing, Applicant believes that all currently pending claims are presently in condition for allowance. Applicant respectfully requests a timely Notice of Allowance be issued in this case. If the Examiner believes that any further action by Applicant is necessary to place this application in condition for allowance, Applicants request a telephone conference with the undersigned at the telephone number set forth below.

Respectfully Submitted,
LAW OFFICE OF MARK J. SPOLYAR
By

/Mark J. Spolyar/
Mark J. Spolyar
Reg. No. 42,164

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Customer Number: 30505
Law Office of Mark J. Spolyar
2200 Cesar Chavez St., Suite 8
San Francisco, CA 94124
415-826-7966
415-480-1780 fax